



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6  
1445 ROSS AVENUE, SUITE 1200  
DALLAS TX 75202-2733

23 OCT 2017

CERTIFIED MAIL: RETURN RECEIPT REQUESTED (7014 2120 0003 8222 8602)

Mr. Chris Linendoll, E.I.T., Section Manager  
Wastewater Permitting Section (MC-148)  
Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, TX 78711-3087

Re: Interim Objection of Draft Permit  
TPDES Permit No. TXS000901 (WQ0004350000)  
City of Fort Worth – Tarrant Regional Water District (MS4)

Dear Mr. Linendoll:

Thank you for the opportunity to review the proposed draft permit transmitted in your letter received on September 5, 2017. Based upon the information provided, it is not clear how this permit conforms to the guidelines and requirements established by the Clean Water Act (CWA) and the NPDES regulations. Comments and concerns, including recommendations for clarification are included below. Please provide additional information to address these concerns.

1. **Part III.B.2.f, MCM 6, Construction Site Stormwater Runoff:** Draft permit does not require 1) Procedures for site plan review of sediment and erosion plans; 2) training for construction inspectors. It is unclear how the Maximum Extent Practicable (MEP) standard is met for this permit without applying requirements in TCEQ permits for small MS4s to meet the same MEP standard. (CWQ 402(p)(3)(iii))
2. **Part III.B.2.h.iii.B)- MCM 8, Monitoring, Evaluating and Reporting:** EPA recommends that the Industrial and High-Risk Runoff Monitoring program includes an inspection program to look closely at the activities of facilities, capable of discharging industrial and high-risk runoff to the MS4. That inspection plan should identify the facility, risk level, inspection schedule.

We will be happy to work with you and your staff to clarify or resolve these concerns. Should you have any questions, please call me at (214) 665-7170, or have your staff contact Greg Valentine at (214) 665-3111 or by email at [valentine.greg@epa.gov](mailto:valentine.greg@epa.gov).

Sincerely,

Stacey B. Dwyer, P.E.  
Associate Director  
NPDES Permits and TMDLs Branch

cc (electronic): Rebecca Villalba, Stormwater and Pretreatment Team Leader (MC-148)  
Wastewater Permitting Section Division, TCEQ

Internet Address (URL) • <http://www.epa.gov/region6>

Bcc: NJAHAN (6WQ-PP)  
EROSBORO (6WQ-NP)

ELECTRONIC READING FILE (6WQ-P)  
PERMIT FILE (TXS000901)

## CONCURRENCES

G. Valentine  
6WQ-PO

B. Larsen  
6WQ-PP

T. Shaikh  
6WQ-PO

Sign:

Date: